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2 Rich Sturdevant SBN 269088  
3 **FINANCIAL RELIEF LAW CENTER, APC**  
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5 Irvine, CA 92614  
6 Direct Phone: (714) 442-3319  
7 Facsimile: (714) 361-5380  
8 Email: awarshaw@bwlawcenter.com

9 Attorneys for Debtor in Possession

10 **UNITED STATES BANKRUPTCY COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

12 In Re

13 2<sup>ND</sup> CHANCE INVESTMENT GROUP,  
14 LLC

15 Debtor and Debtor in Possession.

Case No.: 8:22-bk-12142-SC

Chapter 11

**DECLARATION SUPPORTING  
MOTION FOR ORDER CONFIRMING  
DEBTOR'S CHAPTER 11  
LIQUIDATION PLAN WITH BALLOT  
SUMMARY**

**Plan Confirmation Hearing:**

Date: February 8, 2024

Time: 11:00 am

Place: Courtroom C - Virtual

411 W. Fourth Street

Santa Ana, CA 92701

16 I, Richard Sturdevant, declare as follows:

- 17
- 18 1. I am an attorney admitted to practice law in the State of California and before this Court. I
- 19 make this declaration regarding the ballots that my office received in the above-captioned
- 20 case for the Chapter 11 Liquidation Plan. I have personal knowledge of the matter stated
- 21 herein and if called as a witness, I could and would competently testify to the following:
- 22
- 23 2. Debtor received a total of six ballots, all accepting the Debtor's Chapter 11 Plan of
- 24 Reorganization.
- 25
- 26
- 27
- 28

3. No creditor or claimant voted to reject the Debtor's Chapter 11 Plan of Reorganization.
4. A true and correct copy of all six ballots received are attached as **Exhibit 1**.
5. **Chart A** below indicates the ballot summary of votes for tabulation purposes.

**Chart A**

Class	Accepting		Rejecting	
	Number of Ballots Received	Amount <sup>1</sup>	Number of Ballots Received	Number of Ballots Received
4. American Express National Bank	1	\$0227,492.42	0	\$0
4. ASB Ventures, LLC	1	\$201,283.39	0	\$0
4. Felipe Gutierrez, Jr.	1	\$66,125	0	\$0
4. Precision Realty Fund, LLC	1	\$1,256,031.58	0	\$0
4. Salvador Jimenez	1	\$1,122,000	0	\$0
4. Zisman Family Trust	1	\$270,000	0	\$0

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true.

Executed this 11<sup>th</sup> day of January 2024 at Irvine, California

Financial Relief Law Center, APC

/s/ Rich Sturdevant  
Rich Sturdevant

<sup>1</sup> This is the amount listed in the submitted ballot.

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**Exhibit 1**  
**Ballots Received**

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

**Class [ 4 ] Ballot for Accepting or Rejecting Plan by 2<sup>ND</sup> Chance Investment Group, LLC**

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2<sup>nd</sup> Chance Investment Group, LLC filed a plan of reorganization (the Plan) for the Debtor in this case. You should review the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in class [ 4 ] under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.

If your ballot is not received by Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614 on or before December 21, 2023, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan.

If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.

**Acceptance or Rejection of the Plan**

If the voter is the holder of a secured, priority, or unsecured nonpriority claim:

The undersigned, the holder of a Class [ 4 ] claim against the Debtor in the unpaid amount of Dollars, \$227,492.42  
Account Ending: 1007

Official Form 314 (02/20)

page 2

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

Check one box only

Accepts the plan ☒ ]

Rejects the plan ☐ ]

Dated: December 14, 2023

Print or type name: American Express National Bank

Signature:



Dawn S. Osman for Kenneth W. Kleppinger

Title (if corporation or partnership) Attorney/Agent  
for creditor

Address:

c/o Becket & Lee LLP

PO Box 3001

Malvern, PA 19355

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Return this ballot to:

Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614

Ballots will be accepted by mail, facsimile to (714) 361-5380 or email to  
awarshaw@bwlawcenter.com. Electronic transmission is preferable.

**Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC**  
Case No. 8:22-bk-12142-SC

**Class [ 4 ] Ballot for Accepting or Rejecting Plan by 2<sup>nd</sup> Chance Investment Group, LLC**

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2<sup>nd</sup> Chance Investment Group, LLC filed a plan of reorganization (the Plan) for the Debtor in this case. You should review the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in class [ ] under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.

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If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.

**Acceptance or Rejection of the Plan**

If the voter is the holder of a secured, priority, or unsecured nonpriority claim:

The undersigned, the holder of a Class [ 4 ] claim against the Debtor in the unpaid amount of Dollars (\$71,283.39)

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

Check one box only

Accepts the plan ☒ ]

Rejects the plan ☐ ]

Dated:

12/19/23

Print or type name:

ASB Ventures, LLC

Signature:



Title (if corporation or partnership) CEO

Address:

6852 Morehouse St  
Chino, CA 91710

Claim # 26

Return this ballot to:

Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614

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Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

**Class [    ] Ballot for Accepting or Rejecting Plan by 2<sup>ND</sup> Chance Investment Group, LLC**

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2<sup>nd</sup> Chance Investment Group, LLC filed a plan of reorganization (the Plan) for the Debtor in this case. **You should review the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in class [ 4 ] under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.**

**If your ballot is not received by Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614 on or before December 21, 2023, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan.**

**If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.**

**Acceptance or Rejection of the Plan**

If the voter is the holder of a secured, priority, or unsecured nonpriority claim:

The undersigned, the holder of a Class [ 4 ] claim against the Debtor in the unpaid amount of Dollars (\$66)125.00



Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

Check one box only

Accepts the plan ☒

Rejects the plan ☐

Dated: 12/21/2023

Print or type name: Felipe Gutierrez Jr

Signature:  Title (if corporation or partnership) \_\_\_\_\_

Address: 13056 Sycamore Ave. apt. B  
Chino, CA. 91710  
\_\_\_\_\_  
\_\_\_\_\_

Return this ballot to:

Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614

Ballots will be accepted by mail, facsimile to (714) 361-5380 or email to  
awarshaw@bwlawcenter.com. Electronic transmission is preferable.

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

**Class [ 4 ] Ballot for Accepting or Rejecting Plan by 2<sup>ND</sup> Chance Investment Group, LLC**

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2<sup>nd</sup> Chance Investment Group, LLC filed a plan of reorganization (the Plan) for the Debtor in this case. You should review the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in class [ ] under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.

If your ballot is not received by Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614 on or before December 21, 2023, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan.

If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.

**Acceptance or Rejection of the Plan**

If the voter is the holder of a secured, priority, or unsecured nonpriority claim:

The undersigned, the holder of a Class [ 4 ] claim against the Debtor in the unpaid amount of Dollars (\$1,256,031.58

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

Check one box only

Accepts the plan ☒

Rejects the plan ☐

Dated:

12/19/23

Print or type name:

Precision Realty Fund LLC

Signature:

Title (if corporation or partnership) CEO

Address:

11353 High dale St.  
Norwalk, CA 90650-1135

Claim #49

Return this ballot to:

Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614

Ballots will be accepted by mail, facsimile to (714) 361-5380 or email to  
awarshaw@bwlawcenter.com. Electronic transmission is preferable.

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

Check one box only

Accepts the plan ☒

Rejects the plan ☐

Dated:

12-20-2023

Print or type name:

Salvador Jimenez

Signature:

Sal Jim

Title (if corporation or partnership) \_\_\_\_\_

Address:

12822 Clemson Dr.  
Eastvale CA 92880

Return this ballot to:

Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614

Ballots will be accepted by mail, facsimile to (714) 361-5380 or email to  
awarshaw@bwlawcenter.com. Electronic transmission is preferable.

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC

**Class [ ] Ballot for Accepting or Rejecting Plan by 2<sup>ND</sup> Chance Investment Group, LLC**

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If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.

**Acceptance or Rejection of the Plan**

If the voter is the holder of a secured, priority, or unsecured nonpriority claim:

The undersigned, the holder of a Class [X] claim against the Debtor in the unpaid amount of Dollars (\$225,000.<sup>00</sup>)

unsecured

Plus interest of  
\$45,000.<sup>00</sup>

Total \$270,000.<sup>00</sup>

Bankruptcy Case of 2<sup>nd</sup> Chance Investment Group, LLC  
Case No. 8:22-bk-12142-SC


Check one box only

Accepts the plan ☒

Rejects the plan ☐

Dated: 12/19/23

Print or type name: Aaron Zisman AKA Zisman Family Trust

Signature:  Title (if corporation or partnership) \_\_\_\_\_

Address: 18518 Dancy St  
Rowland Hg, Ct 91748

Return this ballot to:

Andy C. Warshaw, 1200 Main St., Suite C, Irvine, CA 92614

Ballots will be accepted by mail, facsimile to (714) 361-5380 or email to  
awarshaw@bwlawcenter.com. Electronic transmission is preferable.